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November 18, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: WC Docket No. 02-314 – Application of Qwest Communications International Inc. for Authorization to Provide In-Region, InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits the following information in response to questions from the FCC’s staff regarding Qwest’s resold business volume and performance on OP-5 in Washington state.

With respect to resold business volume, there are 5,209 resold 1FB business lines in Washington as of September 2002. With respect to Qwest’s commercial performance under OP-5 in Washington, Qwest missed the resold business OP-5 (New Installation Service Quality) metric four of the past seven months. Qwest’s ongoing performance management efforts have identified several issues tied to this metric, all of which are being addressed with action plans. Outlined below is a summary of those activities.

Qwest’s research pointed to a high frequency of feature-related trouble tickets. Qwest RCMAC, the organization responsible for provisioning features, implemented a process-adherence initiative in an effort to reduce the number of feature-related trouble tickets generated within 30 days of inward line installation activity. This effort has significantly reduced the number of feature-related trouble reports. In June and July, for example, Qwest feature-related trouble reports for resold business products represented 10.10% and 11.0% of the total number of trouble reports, respectively. In August and September, those numbers were reduced, respectively, to 5.15% and 7.23% of the total number of trouble reports. Qwest continues to monitor process compliance in this area.

Resold business lines for the June through September period have a higher proportion of test OKs (“TOK”) and no trouble found (“NTF”) than does Qwest retail, as shown in the following table. Qwest research has identified that one CLEC in Washington accounted for between 43% and 88% of the NTF/TOK trouble reports

received between June and September for resold business products. Qwest has added this issue to the agenda of an upcoming meeting with this CLEC in an effort to minimize this occurrence.

Percent of TOK/ NTF		
	Wholesale	Retail
Jun-02	7.07	2.36
Jul-02	8	3.31
Aug-02	13.4	3.1
Sep-02	7.23	2.01

Outside plant facility issues increased more than 300% in August and an additional 16.85% in September for wholesale resold business products. Since this issue is relatively new, Qwest has not completed its investigation of the cause of these facility issues. At this time, no clear solutions are available to determine the cause of the increase.

Plant facility related issues for the Business Product (in %)		
	Wholesale	Retail
Jun-02	2.02	3.82
Jul-02	2.00	4.11
Aug-02	8.25	3.49
Sep-02	9.64	2.82

Research also has discovered that approximately 23% of the wholesale OP-5 trouble tickets were issued within 30 days of a non-inward line activity_order, such as billing-only type orders. Qwest will no longer include these tickets with the November performance results that will be available for review in December.

The twenty-page limit does not apply to this filing.

Respectfully submitted,

Hamee Haney

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